UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)

IN RE:

Reginald Bernard Draughn

CHAPTER 13

CASE NO.: 21-12276-amc

Debtor

RELATED DOCUMENT: 124

PRAECIPE TO WITHDRAW MOTION FOR RELIEF FROM STAY AND CO-DEBTOR STAY

A Motion for Relief From Stay provision of § 362(a) and from the Co-Debtor stay provision of 11 U.S.C. § 1301 with respect to real Mortgaged Premises located at 717 Glasgow Street, Pottstown, PA 19464 ("Motion") was filed in this action by Planet Home Lending, LLC ("Movant"), by and through its counsel, Hill Wallack, LLP.

PLEASE TAKE NOTICE that the Movant hereby withdraws its Motion.

HILL WALLACK, LLP

By: /s/ Angela C. Pattison, Esq. Angela C. Pattison, Esq., Attorney ID 307611 Hill Wallack, LLP 1415 Route 70 East, Suite 309 Cherry Hill, NJ 08034 Telephone 856-616-8086 Facsimile 856-616-8081

Email: apattison@hillwallack.com

Dated: September 20, 2024

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served or caused to be served the above-captioned pleading, Praecipe to Withdraw, on the parties below via First-Class Mail and Electronic Notification on September 20, 2024.

Reginald Bernard Draughn

717 Glasgow St Pottstown, PA 19464 Debtor Via Regular Mail

Dated: September 20, 2024

Marie A Draughn aka Marie A Walker aka Marie Walker 717 Glasgow St Pottstown, PA 19464 Co-Debtor Via Regular Mail

Office of the U.S. Trustee

Robert N.C. Nix Federal Building 900 Market Street Suite 320 Philadelphia, PA 19107 **United States Trustee** Via ECF

Kenneth E. West 1234 Market Street – Suite 1813 Philadelphia, PA 19107 **Chapter 13 Trustee** Via ECF

Respectfully submitted,

By: /s/ Angela C. Pattison Angela C. Pattison, Esq., Attorney ID 307611 Hill Wallack, LLP 1415 Route 70 East, Suite 309 Cherry Hill, NJ 08034 Telephone 856-616-8086

Email: apattison@hillwallack.com